

DATE: March 24, 1993 (Update February 13, 1995)

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TO: Permit Section, District Air Leaders, Mary Oleson-SD/Air, Carol Crawford-LMD/Air, Craig Stemler-LMD/Air, Robin Capen-NCD/Air, Brad Erickson-Lacrosse Area Office, Brett Ballavance-Superior Area Office, Mehrdad Moghimi-WD/Air, Dennis Antonie-SED/Air, and Jeff Burger-SED/Air.

FROM: Dan Johnston AM/7

SUBJECT: Small boiler NSPS record keeping

The NSPS for small boilers (10X100 million BTU/hr) requires that all boilers covered by the rule keep daily records of fuel usage. This applies to all natural gas fired boilers even though there is no emission limit for these boilers. In talking with US EPA I discovered that EPA has made a ruling that natural gas and #2 fuel oil fired units did not have to keep records of daily fuel usage. They could keep records of weekly or monthly usage depending on the company's capability. Attached is the February 20, 1992 memo from John B. Rasnic, Dir. Stationary Source Compliance Division to Jewell A. Harper, Chief Air Enforcement Branch where this is approved.

If you have any questions please call me at 608/267-9500.

attach:

cc: Brenda Hagman AM/7

MEMORANDUM: (dated Feb. 20, 1992)

SUBJECT: Request for Determination Regarding the Daily Fuel Usage Monitoring Requirements in 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

FROM: John B. Rasnic, Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards

TO: Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides and Toxics Management Division  
Region IV

This is in response to your memorandum of December 9, 1991 requesting a determination regarding whether the requirement to record and maintain records of the amount of fuel combusted each day [40 CFR s.60.48c(g)] can be modified or waived for steam generating units that burn only natural gas or only low sulfur (less than 0.5 weight percent) distillate oil.

SSCD assumes that the plant in question is an affected facility as defined at 40 CFR s. 60.40c(a). It is correct that Subpart Dc has no established emission limits for facilities which burn only natural gas. Therefore, we agree with your determination that daily monitoring of the quantity of natural gas consumed at this facility serves little purpose, except where natural gas is fired in combination with other subject fuels, for purposes of prorating the standard. Similarly, daily monitoring of the quantity of distillate oil (with, less than 0.5% sulfur) burned also serves little purpose where distillate oil is the sole fuel fired, if fuel supplier certifications are used to demonstrate compliance.

SSCD therefore agrees that on an individual basis, the requirement of 40 CFR s. 60.48c(g) to record and maintain the amount of fuel combusted each day can be altered pursuant to authority in 40 CFR s. 60.13(i), where: (a) the only fuel used is natural gas, or (b) the only fuel used is distillate oil with a sulfur content less than 0.5% and compliance is demonstrated using supplier certifications. Instead, the amount of natural gas or low sulfur distillate oil which a plant combusts could be reported on a less frequent basis, for example a monthly basis. This monthly report could be in the form of fuel bills or meter readings, for example. Requiring some level of fuel monitoring as opposed to a complete waiver, is necessary to provide the delegated enforcement agency with evidence of the type and quantity of fuel a plant is combusting. Additionally, the enforcing agency should require that such sources certify that they will burn only natural gas or distillate oil using fuel certification, and that they will promptly notify the agency of any anticipated and actual switches in fuel use.

For those units using low sulfur distillate fuel oil, this alternative monitoring option is not an exemption from compliance with any of the fuel certification requirements, including those of 40 CFR s. 60.42c(h), 60.44c(g), or any of the reporting requirements, including those of s. 60.48c(e)(11) and 60.48c(f).

Since the authority to approve alternative monitoring has not been delegated to the Regions, SSCD should be sent copies of any alternative monitoring provisions approved in accordance with this memo. If there are any questions regarding the issues presented in this memo, please feel free to contact Scott Nelson of my staff at FTS 678-8707.

cc: David McNeal, Region IV  
Air Branch Chiefs, Regions I - X  
Rick Copland, ESD  
Kathryn Smith, AED